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November 30, 2020

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: United States v. Daniel Capaldo, et al.,
19 Cr. 442 (BMC)
EXTENSION REQUEST OF EMERGENCY BAIL APPLICATION COVID-19

Honorable Judge Cogan:

I am writing to request on behalf of Mr. Capaldo that the Court's Order of March 30, 2020, releasing him under conditions due to the COVID-19 Pandemic, be continued until Mr. Capaldo's sentencing date of March 2, 2021. **The Government does not object to this request.** Mr. Capaldo has been in full compliance with all of the Court's conditions since his release.

I respectfully request for permission to renew this application before the expiration of this extension, if granted by the Court.

Thank you for your attention to this matter.

Respectfully submitted,

Peter Guadagnino

Peter Guadagnino, Esq.

Attorney for Daniel Capaldo

cc: A.U.S.A. Elizabeth Geddes